



**AIR PROGRAM ADVISORY FORUM**  
**February 2, 2006**  
**Meeting Notes – Brief summary of items discussed**

New Source Review Reform Rule Change and SIP Revision 10 CSR 6.060 Section (8)

Status: Rule effective as of December 31, 2004

SIP Revision submitted to EPA Region VII February 2005. The Air Pollution Control Program is unsure how District Court ruling striking down the Pollution Control Projects and Clean Units effect our rules. EPA Region VII advises that even though the reform rules are in the state regulations, sources should not utilize them since they are not in the federally approved State Implementation Plan.

Insignificant Rule Change and State Implementation Plan (SIP) Revision 10 CSR 6.061

Status: Rule effective as of February 28, 2005

SIP Revision submitted to EPA Region VII April 6, 2005 – still pending

Permit by Rule

The program has started the rule making process to change the current rule to include a 7 day notification. Under the direction of the commission, the program is already implementing this 7 day notification period.

Construction Industry EIQ

The program is working on a pilot of the EIQ form for the construction industry.

Upwind NO<sub>x</sub> Rulemaking

This rule is going through rulemaking process.

MOEIS

Program staff and staff from the Information Technology Services Division have been working with three local agencies to provide them with tools needed to facilitate a batch upload of 2004 emissions data into MOEIS. A couple of the local agencies have successfully submitted 2004 emissions data using the XML schema and data format required to upload data into MOEIS. The MOEIS on-line system was impacted by this project and was not available for use by industry. The MOEIS system is now available for data entry as of February 3, 2006. The program apologizes for any hardship caused by this delay. The XML schema will be made available each year. If you are interested in receiving a copy of this XML schema, contact Cheryl Hickman at 573-751-4817, [cheryl.hickman@dnr.mo.gov](mailto:cheryl.hickman@dnr.mo.gov) or [www.dnr.mo.gov/env/apcp/index.html](http://www.dnr.mo.gov/env/apcp/index.html).

Enforcement Review Board

The Enforcement Review Board is a group of department staff that meets approximately every two weeks to review all enforcement actions the department is recommending to the refer to the Attorney General's Office. The intent of this group is to ensure consistency throughout the department concerning referrals to the Attorney General's Office. The group held its initial meeting on January 17, 2006.

Process Weight Rule

The workgroup has met and determined three possible additional exemptions to this rule. The three proposed exemptions are: coating operations with at least 90% control; emission units that existing

federal rules already require control equipment with at least 90% control; and emission units that when operating at the maximum hourly design rate have a potential to emit less than the allowable emission rates in sections (3)(A)(1) and (3)(A)(2) of the rule.

The workgroup is currently drafting suggested language for the program to utilize in initial discussions with EPA and in the rulemaking process. The workgroup will present draft language at the next forum meeting. This language will need to provide adequate justification for adding the suggested exemptions. State statute requires that a rulemaking include adequate justification as evidence that the rulemaking is necessary.

#### Clean Air Interstate Rule (CAIR)/Clean Air Mercury Rule (CAMR)

The program has been holding workgroup meetings on these rules since August 2005. The program is basically recommending adopting EPA's rules. Based on the timing so far, the program will not meet EPA deadlines for rulemaking. However, since the implementation date of the rules is not until 2009, the program is confident the rules will be in place in a timely manner. The next workgroup meeting is February 10, 2006 from 10:00 am to 2:00 pm in the Roaring River Conference Room at the Elm Street Conference Center.

#### Open Burning Workgroup

The program has been working on revising the Open Burning rules to make them consistent throughout the state. The next Open Burning workgroup meeting is scheduled for February 7, 2006, from 10:00 am to 1:00 pm in the Ha Ha Tonka Conference Room at the Elm Street Conference Center.

#### Regional Haze/ BART

Currently there is no formal time line for this rulemaking. The program is following EPA's rules.

#### Boiler MACT

The new federal requirements are being adopted into the state rules with a rulemaking already in progress. This rulemaking is expected to be effective in the state rules by the end of this year. This rulemaking is expected to be filed with the Secretary of State's Office on April 4th and should appear in the Missouri Register on May 1st. Once Missouri has adopted the rule the program is the Administrator. However, even though the program is the delegated authority, we recommend copying EPA on all reports.

#### Permitting Wizard

Joe Engeln of the Department Director's office gave an overview of the Permitting Wizard, a department wide project focusing on permit automation. This is a part of the initiative by the department to improve and streamline the permitting and enforcement activities in the entire department.

#### Air Pollution Control Program update

- Fees – Jim Kavanaugh, Leanne Tippet Mosby and Commissioner Foresman met with Director Childers to discuss options for additional funding for the program. Director Childers was supportive and recommended the program and fee workgroup move forward with pursuing some of the ideas.
- Change in organization of the program – 3 staff positions previously located in the Air Quality Analysis Section have been moved to the Permit Section. These three staff will report directly to Kyra Moore, the Permit Section Chief and be solely responsible for air quality modeling related to permit projects.

- Hiring new staff – The program is currently in the process of hiring two operating permit engineers, one engineer in our Rules and SIP unit, one air quality modeler, an asbestos inspector and the new Operations Section Chief. All of these positions are in the final stages of hiring.
- Transfer of staff – Layli Terrill and Lucy Thompson, formerly staff members with the Outreach and Assistance Program, now work directly for the Air Program. Layli and Lucy will be assisting industry in permit and EIQ form preparation and other tasks they were performing for the Outreach and Assistance Program.
- EIQ Reporting Requirements – the program is looking into possible changes to the reporting requirements for small industry. The program is currently reviewing all requirements.
- St Louis Nonattainment Area - The program is considering the possibility of allowing offsets from the entire metropolitan nonattainment area, including Illinois. The program will begin discussions with the Illinois EPA, and if agreeable, we can begin work on drafting an MOU to establish criteria and procedures.

### EIQ Workshops

The EIQ Workshops have now been scheduled. <http://www.dnr.mo.gov/env/apcp/moeisupdate.htm>

Feb. 14, 2006 - Jefferson City  
 Elm Street Conference Center  
 Roaring River Conference Room  
 1738 E. Elm Street  
 Jefferson City, MO 65101  
 10 a.m. - 2 p.m.

Feb. 15, 2006 - St. Louis  
 St. Louis Regional Office  
 7545 S. Lindbergh Blvd.  
 St. Louis, MO 63125  
 10 a.m. - 2 p.m.

Feb. 22, 2006 - St. Louis  
 St. Louis Regional Office  
 7545 S. Lindbergh Blvd.  
 St. Louis, MO 63125  
 10 a.m. - 2 p.m..

Feb. 24, 2006 - Kansas City  
 Kansas City Health Department  
 2400 Troost Ave.  
 Kansas City, MO 64108  
 10 a.m. - 2 p.m.

Feb. 28, 2006 - Springfield  
 Location To Be Determined  
 10 a.m. - 2 p.m.

Space for this training is limited. If you are interested attending a training workshop, please contact the MOEIS Help Desk at 1-866-663-4748, to reserve a place.

**Future Air Program Advisory Meetings**

March 30, 2005 1:00 PM – 4:00 PM, Roaring River Conference Room (same day as March Air Conservation Commission Meeting)